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August 8, 2024

**VIA ECF**

Pamela K. Chen, U.S.D.J.  
United States District Court, Eastern District of New York  
225 Cadman Plaza East, Courtroom 4F North  
Brooklyn, New York 11201-1804

Re: *IME Watchdog, Inc. v. Gelardi, et al.*  
Case No.: 1:22-cv-1032 (PKC)(JRC)

Dear Judge Chen:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC and write to request an enlargement of our time to respond to this Court's Minute Order dated July 29, 2024, from August 12, 2024 to August 26, 2024. Plaintiff's counsel consents to a one-week enlargement to August 19, 2024.

A two-week enlargement is requested because defendant Safa Gelardi has yet to return to her home in Texas (where defendants' financial records are located) since the last hearing on July 29<sup>th</sup>. I have been advised that Safa has yet to return because her brother suffered a heart attack and underwent open heart surgery, forcing her to stay in New York and to serve as her brother's principal care giver. Defendants cannot submit all financial records until after Safa has returned to Texas and completed the task of compiling all pertinent financial documents. I have also been advised that defendants' have made a payment proposal to Berkeley Research Group, LLC concerning defendants' outstanding bill, and that Berkeley is considering defendants' proposal. Additional time is thus also needed for defendants to finalize a payment plan with Berkeley.

Respectfully,

*/s/ Jonathon D. Warner*

JDW/ks

cc: All counsel (via ECF)